

U.S. Department of Justice



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United States Attorney
Southern District of New YorkThe Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

July 16, 2008

MEMO ENDORSED

Matter Adj to 9/4/08
At 9:45 am. Time Excluded
Colleen McMahon
7/16/08

BY FACSIMILE: (212) 805-6326
The Honorable Colleen McMahon
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Marino Collazo and Gersain Moreno-Ortiz
08 Cr. 436 (CM)

Dear Judge McMahon:

The Government respectfully submits this letter, after speaking with Your Honor's Deputy, to request jointly with the defense an adjournment of the pre-trial conference currently scheduled for July 18, 2008 to a date convenient for the Court in September, 2008.

The Government also respectfully requests that time be excluded for purposes of the Speedy Trial Act from July 18, 2008 through the date of the next conference. The Government makes this request, with the consent of defense counsel, to permit the Government and the defense to pursue discussions regarding a possible disposition without the need for trial, and to provide the defense with an opportunity to review discovery.

Respectfully submitted,

MICHAEL J. GARCIA
United States Attorney

By:

Eugene Ingoglia/ Jenna Dabbs
Assistant U.S. Attorneys
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cc: Lee Ginsberg, Esq. (counsel for Marino Collazo) (212) 962-9696 fax
Paul Testaverde, Esq. (counsel for Gersain Moreno-Ortiz) (718) 779-3306 fax